

**SUPPLEMENTAL VERIFIED STATEMENT OF ROBIN L. JACOBSON
ON BEHALF OF AMERITECH ILLINOIS**

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Robin L. Jacobson. My office is located at 200 Center Street Promenade,
3 Room 735, Anaheim, CA 92805.

4 Q. ARE YOU THE SAME ROBIN JACOBSON WHO FILED DIRECT TESTIMONY
5 IN THIS DOCKET?

6 A. Yes.

7 Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL VERIFIED
8 STATEMENT?

9 A. I will respond to the testimony of Staff Witness Samuel S. McClerren on Arbitration
10 Issue Number 8, OSS Availability.

11

12 **ISSUE 8 - OSS AVAILABILITY**

13 Q. PLEASE SUMMARIZE AMERITECH ILLINOIS' POSITION ON WHETHER
14 CLECS SHOULD HAVE DIRECT ELECTRONIC ACCESS TO AMERITECH
15 ILLINOIS' OPERATIONAL SUPPORT SYSTEMS ("OSS").

16 A. As I stated in my direct testimony, it is my understanding that, under the
17 Telecommunications Act of 1996, Ameritech Illinois has an obligation to provide

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00-0312/0313
Ameritech Ill. Ex. 3.1
Date 02-30-00 Reporter CB

1 CLECs with nondiscriminatory access to its OSS. The FCC has stated that an
2 incumbent local exchange carrier ("ILEC") must provide competing carriers access to
3 OSS functions for pre-ordering, ordering, provisioning, maintenance and repair, and
4 billing that is equivalent to what the ILEC provides to itself, its customers or other
5 carriers. Consistent with this obligation, on June 6, 2000, Ameritech Illinois began
6 providing CLECs with equal, nondiscriminatory access to SBC/Ameritech Illinois' OSS
7 information related to line sharing, in parity with SBC/Ameritech Illinois' affiliate and
8 SBC/Ameritech Illinois' own retail representatives. (SBC/Ameritech Illinois' Response
9 to Covad's and Rhythms' Petition for Arbitration, p. 28).

10
11 **Q. IN MR. McCLERREN'S DIRECT TESTIMONY, HE STATES THAT THE**
12 **ISSUE OF WHETHER CLECS SHOULD HAVE ACCESS TO PRE-ORDERING**
13 **FUNCTIONALITIES NO LATER THAN JUNE 6, 2000 (IN PREPARATION FOR**
14 **LINE SHARING) MAY HAVE BEEN RESOLVED. HOW DO YOU RESPOND?**

15 **A.** I agree that this issue has been resolved. As Mr. McClerren testified, Ameritech Illinois
16 resolved this issue by implementing pre-ordering enhancements on May 17, 2000.
17 Ameritech Illinois added pre-ordering functionality in Illinois which includes loop
18 qualification data collaboratively agreed upon by Ameritech Illinois and interested
19 CLECs, including Rhythms/Covad, during the Advanced Services Plan of Record for all
20 13 SBC states.

1
2 **Q. MR. McCLERREN STATES THAT SBC/AMERITECH ILLINOIS MERGER**
3 **CONDITION 29 PROVIDES FOR DIRECT ACCESS TO AN ORDERING**
4 **SYSTEM. DO YOU AGREE?**

5 **A. SBC/Ameritech Illinois merger Condition 29 provides:**

6 **Direct Access to Service Order Processing Systems**

7 In addition to the application-to-application and graphical user interfaces
8 described herein, Ameritech Illinois will offer to develop and deploy direct
9 access to Ameritech Illinois' service order processing systems for resold
10 services, individual UNEs, and combinations of UNEs, provided that a CLEC
11 requesting such direct access enters into a contract to pay Ameritech Illinois for
12 50% percent of the costs of development and deployment. The access
13 developed will meet the requirements of 47 U.S.C. § 251(c)(3). Ameritech
14 Illinois' offer to develop direct access to Ameritech Illinois' service order
15 processing systems will be available for a period of 30 months after the Merger
16 Closing Date, and Ameritech Illinois will agree to develop and deploy the
17 interface contracted for within one year of a completed contract with the
18 CLEC." (Order, Docket 98-0555, p. 253).

19 As Mr. McClerren points out, SBC/Ameritech Illinois merger Condition 29 (which
20 provides for "direct access" to Ameritech Illinois' service order processing systems for
21 resold services, individual UNEs, and combinations of UNEs) refers to making
22 available to CLECs Ameritech Illinois' ACIS service order processing system. This is
23 Ameritech Illinois' direct order entry system, similar to SBC's SORD (Service Order
24 Retrieval and Distribution) system which has been made available to CLECs in Pacific
25 Bell, Nevada Bell, and Southwestern Bell. Since SBC had already made access

1 available to SORD in its then 7-state region, SBC agreed to make ACIS available in
2 Illinois.

3
4 If Rhythms/Covad desire direct connection to SBC/Ameritech Illinois' service order
5 processing system, rather than an electronic interface such as EDI, this stipulation in
6 Condition 29 is available to them. Indeed, the offer was posted on Ameritech Illinois'
7 TCNet thirty days post-merger, per the merger condition. Up to this point in time (and
8 to my knowledge), no one carrier has requested direct access to ACIS.

9
10 Q. IS RHYTHMS'/COVAD'S ARBITRATION REQUEST CONSISTENT WITH
11 CONDITION 29?

12 A. No. The access permitted by merger Condition 29 is NOT the type of access which
13 Rhythms/Covad is requesting in this arbitration. Although Mr. McClerren seems
14 uncertain about what Rhythms/Covad means when they request "direct access," I believe
15 that Rhythms/Covad is requesting access to SBC/Ameritech's back-office systems,
16 rather than utilizing functionality through a "gateway." Condition 29, however, does
17 not allow Rhythms and Covad to have access to a back-office system, such as LMOS
18 or LFACS. Mr. McClerren apparently recognizes this when he states, "If
19 Rhythms/Covad wants direct access to SBC/Ameritech's legacy systems, rather than

1 utilizing an electronic interface such as EDI, I would be unable to support that request in
2 this proceeding.”
3

4 **Q. IS IT REASONABLE FOR RHYTHMS AND COVAD TO OBTAIN DIRECT,**
5 **UNMEDIATED ACCESS TO AMERITECH ILLINOIS' BACK OFFICE**
6 **SYSTEMS?**

7 **A.** No. For the reasons given in my direct testimony, CLECs do not require “direct
8 access” to back-office systems to get access to all information and functionality
9 available through Ameritech Illinois’ pre-ordering, ordering, maintenance and repair
10 and billing systems. Ameritech Illinois has fulfilled its obligation to provide CLECs
11 with nondiscriminatory access to OSS functions by designing, deploying and enhancing
12 “gateways” for CLECs that provide a single entry point for pre-ordering, ordering,
13 maintenance and repair, and billing of local services, including line shared loops.
14 These gateways give the CLECs the ability to provide local service to their end users
15 using one interface per function. Using a single gateway, a CLEC can access pre-
16 ordering information; obtain a telephone number assignment; validate a service address
17 or listing; and perform other necessary functions. Moreover, as I explained in my
18 direct testimony, despite Rhythms/Covad’s assertions to the contrary, these gateways
19 do not provide “filtered” access to data. In contrast, if a CLEC were to access each

1 back office system individually, the CLEC would receive information in various,
2 cryptic formats, which the CLECs would have to train its employees to interpret.

3
4 **Q. DOES THAT CONCLUDE YOUR SUPPLEMENTAL VERIFIED STATEMENT?**

5 **A. Yes.**